

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

DOUGLAS MYRON LORD

No. 3:12-00128
CHIEF JUDGE HAYNES

MOTION TO CANCEL OCTOBER 12 CONFERENCE, CONTINUE TRIAL,
AND EXTEND TIME FOR FILING MOTIONS
REQUIRING AN EVIDENTIARY HEARING

Through counsel, defendant Douglas Myron Lord moves to cancel this Friday's pretrial conference, to extend the time for filing motions requiring an evidentiary hearing until two weeks prior to any trial date, and to continue the trial in this matter. This matter currently is set for trial on October 23, 2012. Mr. Lord is in federal custody pending trial.

In support of this motion, defense counsel would show the following: Defense counsel has now met with Mr. Lord to review the discovery in this matter. Counsel has identified additional investigation and research which is required before Mr. Lord can make a knowing and intelligent decision as to how he should proceed in this matter.

Defense counsel has conferred with Mr. Lord about continuing this matter. Mr. Lord concurs in this request and has signed and filed a speedy trial waiver.

Assistant U.S. Attorney Carrie Daughtrey has indicated she does not oppose this request. The parties would jointly propose that this matter be re-set on January 22, January 29, or another date agreeable to the Court. The parties also request that the deadline for filing pretrial motions requiring an evidentiary hearing to be extended until two weeks before any new trial date.

The requested period of delay is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). Defense counsel respectfully submits that the ends of justice served by a continuance outweigh the interests of the public or defendant in a speedy trial. Further, the failure to grant a

Order
Discontinue
Mr. Lord's motion
the interest
of justice
to allow
defense
counsel
to be
prepared
for trial
trial
will be
set
by
separate
order
Will
10/10/12